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5 **Attorneys for Defendant**  
6 **Fresh Healthy Media, LLC**

7

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **OAKLAND DIVISION**

11

12 **DUFFY ARCHIVE LIMITED,**

13 Plaintiff,  
14 v.

15 **FRESH HEALTHY MEDIA, LLC dba**  
16 **VEGNEWS MAGAZINE,**

17 Defendant.

No. 4:21-cv-08101-HSG

**STIPULATION AND ORDER TO  
ENLARGE TIME TO FILE  
RESPONSIVE PLEADING**

18 Plaintiff Duffy Archive Limited (“Plaintiff”) and Defendant Fresh Healthy Media, LLC  
19 dba VegNews Magazine (“Defendant”) respectfully submit the following stipulation to enlarge  
20 time to respond to the complaint pursuant to Federal Rule of Civil Procedure 6(b).

21 WHEREAS the complaint was filed on October 17, 2021;

22 WHEREAS the parties previously agreed to extend the time by which a responsive  
23 pleading must be filed to December 31, 2021, January 10, 2022, January 24, 2022 and February  
24 7, 2022, and the Court entered Orders to that effect;

25 WHEREAS Defendant served Plaintiff with an Offer of Judgment pursuant to Federal  
26 Rule of Civil Procedure 68 on February 3, 2022 and Plaintiff needs additional time to review and  
27 consider the offer;

28 WHEREAS the parties have made significant progress in their settlement discussions

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1 which are ongoing and believe it is in both parties' interest to try to reach an early resolution  
2 through these discussions rather than spending resources litigating the matter;

3 WHEREAS the parties believe that Defendant having a further extension of time to  
4 respond to the complaint would potentially save judicial resources and allow the parties to focus  
5 their resources on trying to reach an informal resolution.

6 THEREORE, THE PARTIES HEREBY STIPULATE THAT:

7 Defendant shall have until February 22, 2022 to file a responsive pleading to the complaint  
8 and that by filing this stipulation, Defendant does not waive any right to challenge the complaint  
9 on any grounds, including, but not limited to, lack of jurisdiction and improper venue.

10 IT IS SO STIPULATED.

11 Dated: February 4, 2022

**SRIP LAW**

13 By: /s/ Jonah. A Grossbardt  
14 **Jonah A. Grossbardt**  
15 **Attorneys for Plaintiff**  
**Duffy Archive Limited**

16 Dated: February 4, 2022

**THOITS LAW**

17 By: /s/ Andrew P. Holland  
18 **Andrew P. Holland**  
19 **Attorneys for Defendant**  
**Fresh Healthy Media, LLC**

20 **ORDER**

21 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have until  
22 February 22, 2022 to answer or otherwise respond to Plaintiff's complaint without waiving any  
23 right to challenge the complaint on any grounds, including, but not limited to, lack of jurisdiction  
24 and improper venue.

26 Dated: 2/4/2022

27   
28 **UNITED STATES DISTRICT COURT JUDGE**